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*ADMITTED IN DC ONLY

August 11, 2014

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 12-375 - Global Tel*Link Corporation - Notice of Ex Parte Presentation

Dear Secretary Dortch:

On August 8, 2014, David Silverman, Senior Vice President and General Counsel for Global Tel*Link Corporation ("GTL") and the undersigned, met with Lynne Engledow, Kalpak Gude, Rhonda Lien, and David Zesiger of the Wireline Competition Bureau, Pricing and Policy Division, and Sarah E. Citrin, Office of General Counsel, to discuss matters relating to inmate calling services ("ICS") addressed by the Federal Communications Commission's ("FCC's") Report and Order and Further Notice of Proposed Rulemaking ("*Order and FNPRM*").¹

The primary purpose of GTL's meeting was to review the outline of "Necessary Conditions for Lower Interstate and Intrastate Inmate Calling Rates" submitted by Securus Technologies, Inc. as part of its July 23, 2014 ex parte presentation notice ("July 23, 2014 Ex Parte"). GTL explained that it has been actively pursuing discussions with other ICS providers and inmate rights advocates to

¹ Report and Order & Further Notice of Proposed Rulemaking, *Rates for Interstate Inmate Calling Services*, 28 FCC Rcd 14107 (2013).

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assess the degree of consensus on regulatory solutions that recognize the rights and interests of all stakeholders affected by the outcome of the FCC's *Order and FNPRM*.

GTL explained that a comprehensive regulatory framework that includes mandatory decreases in commissions paid to facilities, interstate and intrastate rate caps, and the reduction or elimination of certain fees based on market realities will lead to lower, market-based rates. GTL agreed with the FCC that elimination of site commissions or "admin-support payments" may not be possible in light of legitimate costs incurred by correctional facilities related to the provision of inmate calling services.² Reducing these admin-support payments to levels commensurate with their costs is fundamental to decreasing ICS rates. GTL suggested such admin-support payment decreases could be phased in over a three-year period.

GTL also reported that there is general industry support for a rate cap on both interstate and intrastate ICS. GTL agreed that the elimination of the fees and ancillary charges identified in the *July 23, 2014 Ex Parte*, plus reductions and caps for other fees need to part of any comprehensive regulatory framework for ICS. In this context, GTL discussed implementing caps on "add on" fees related to deposits made through third-party transactions with services such as those offered by Western Union and Money-Gram. GTL suggested industry consent might be the most efficient means of achieving such reductions or elimination of fees, and any agreed to fee regime should be subject to publication by all ICS providers.

In the context of this discussion, GTL emphasized that Section 276 of the Act provides the primary legal authority for addressing these issues, but support can be found in other provisions and precedence.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this notice is being filed in the appropriate docket.

² See *Securus Techs., Inc. v. FCC*, Nos. 13-1280, 13-1281, 13-1291, 13-1300, *Brief of Federal Communications Commission*, n.6 (D.C. Cir. filed July 21, 2014).

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Secretary
August 11, 2014

Please contact me if you have any questions regarding this matter.

Respectfully submitted,

/s/ Chérie R. Kiser

Chérie R. Kiser

Counsel for Global Tel*Link Corporation

cc (via e-mail): Lynne Engledow
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